

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-210-E

Request of Clifton Power Company on)	
the Public Service Commission's)	
Jurisdiction of Electric Vehicle)	PETITION TO INTERVENE
Charging Stations)	
)	

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On June 22, 2021, Clifton Power Company filed a letter requesting that the Commission clarify its position regarding its jurisdiction over 1) the manufacturing, siting, developing, installing, commissioning and/or operating the electric vehicle charging stations other than by electric utilities i) when the power is supplied – directly or indirectly – by a regulated utility and ii) when the power is supplied – directly or indirectly – by a Commission unregulated utility; b) if the power is supplied to the charging station only after being “treated” (stored in a battery before being provided) does that have any impact to the Commission’s jurisdiction; c) if the charging stations deliver power at any frequency other than 60 AC Hz or DC power, does the Commission have any jurisdiction; and d) if

the EVSC changes the characteristics of the power in any way, does the Commission have jurisdiction.

2. On March 10, 2022, the Commission issued a directive order (Order No. 2022-164) directing the Chief Clerk to set this matter for hearing and provide prefiled testimony guidelines, as well as setting an intervention date for any interested stakeholders. On March 31, 2022, the Clerk's Office issued a Notice of Filing and Hearing setting an intervention deadline of April 27, 2022.

3. CCL is a nonprofit corporation organized under the laws of the State of South Carolina whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL and its members support the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from regulated and unregulated electric utilities in South Carolina and who have an interest in the deployment of electric vehicles and electric vehicle charging equipment across the state. As such, CCL may be impacted by the Commission's decisions regarding its jurisdiction over electric vehicle charging. The principal address of CCL is 131 Spring St., Charleston, South Carolina 29403.

4. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members who receive electricity service from regulated and unregulated electric utilities in South

Carolina, have an interest in the deployment of electric vehicles and electric vehicle charging equipment across the state, and thus may be impacted by the Commission's decisions regarding its jurisdiction over electric vehicle charging. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

5. Petitioners have not developed a final position in this matter, but their participation will be aimed at supporting clean energy decisions that are supported by South Carolina law and will lead to cleaner, safer, and healthier communities for all South Carolinians. Petitioners reserve the right to modify, amend, or expand any position developed over the course of this proceeding.

6. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 27th day of April, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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